



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

610 Federal Plaza
Central Islip, New York 11722

August 13, 2020

By ECF

Honorable Kiyo Matsumoto
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Greebel, 15-CR-0637 (E.D.N.Y.) (KAM)

Dear Judge Matsumoto:

This office represents the government in the above-captioned matter. The government writes, with consent of defendant Evan Greebel (“Defendant”), to respectfully request an extension of time, from August 17, 2020 until October 12, 2020, to submit its response to Defendant’s June 12, 2020 opposition to the government’s writs of continuing garnishment to garnishees Merrill Lynch, Pierce, Fenner & Smith Inc. [Dkt 694] and Charles Schwab Retirement Plan Services [Dkt 703] (“Opposition”). The parties have been attempting to resolve these garnishment actions without the need for further litigation, however, it now appears that a negotiated resolution is not possible. The parties have conferred and, given the parties’ current schedules, ongoing issues related to the COVID-19 pandemic, and the upcoming Jewish holidays in September and early October, have agreed upon a final proposed briefing schedule. The government therefore respectfully requests, with Defendant’s consent, that the Court extend the government’s deadline to respond to Defendant’s Opposition until October 12, 2020, and the Defendant’s reply deadline to November 6, 2020.

This is the government’s third request for an extension of time to file its response to Defendant’s Opposition. The Court has previously granted two extension requests by the government, with Defendant’s consent, for a total of 46 days, and four requests by Defendant, with the government’s consent, to extend Defendant’s deadline to file its Opposition, for a total extension of 126 days.¹ See Dkt 726, 728, 730 & 735. There are

¹ In its prior extension requests, the government incorrectly calculated and reported the total number of days extended at Defendant’s request as 140 days. Additionally, prior to Feb 7, 2020, the Court had granted three extensions of time, totaling 356 days, for Defendant to submit his opposition to the writs of continuing garnishment while Defendant appealed his conviction in this matter. See Dkt 699, 708 & 720.

currently no other scheduled deadlines or court appearances that will be affected should the Court approve this request.

The government thanks the Court for its attention to this matter.

Respectfully submitted,

SETH D. DUCHARME
Acting United States Attorney

By: /s/ Thomas R. Price
THOMAS R. PRICE
Assistant U.S. Attorney
(631) 715-7893

cc: All Counsel of Record via ECF